

1 Stephen R. Cochell
2 Admitted Pro Hac Vice
3 *srcochell@gmail.com*
4 5850 San Felipe, Ste. 500
5 Houston Texas 77057
6 Telephone: (713) 436-8000
7 Facsimile: (213) 623-2000

8 Allan Grant (SBN#213658)
9 Grant's Law Firm
10 17351 Greentree Drive
11 Riverside, California 92503-6762
12 Telephone (888)937-7555
13 Facsimile (866)858-6637

14 Attorneys for Defendant
15 JASON EDWARD THOMAS CARDIFF

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17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 vs.

22 JASON EDWARD THOMAS
23 CARDIFF,

24 Defendant.

25 Case No. 5:23-CR-00021-JGB

26 **NOTICE OF SUPPLEMENTAL
27 AUTHORITY REGARDING
28 GOVERNMENT'S MOTION TO
FORFEIT BAIL AND FOR
SUMMARY ADJUDICATION AND
CORRECTION OF RECORD**

29 **NOTICE OF SUPPLEMENTAL AUTHORITY**

30 PLEASE TAKE NOTICE that counsel for Jason Cardiff and the Sureties,
31 Brian Kennedy and Lila Murphy invite the Court's attention to: *Raich v. Gonzales*,
32 500 F. Supp. 2d 1102, 1110 (9th Cir. 2007). This is relevant to the medical necessity
33 defense raised by Defendant.

34 With respect to Defendant's Motion to Forfeit Bail and for Summary
35 Adjudication, on behalf of Ms. Murphy, Government counsel falsely and inaccurately
36 portrayed asserting that between Ms. Murphy and Mr. Kennedy, only two requests
37 were made to Defendant by the sureties to return to Houston. Dkt. 204 at 4. In fact,

1 Ms. Murphy asked Mr. Cardiff if he was returning to Houston, as first set out in
2 Paragraph 17 and later in Paragraph 20, stating that although Mr. Cardiff had medical
3 problems, he was putting her home at risk and that he needed to return to Houston to
4 cure that problem. Dkt. 199-1¶ 20.

5 Dated: February 24, 2025.
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7 /s/ Stephen R. Cochell
8 Stephen R. Cochell
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1 **SERVICE LIST**

2 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL
3 HAVE BEEN SERVED WITH THIS DEFENDANT JASON
4 CARDIFF'S NOTICE OF MOTIO AND MOTION TO SUPPRESS
5 EVIDENCE THROUGH THE COURT'S ECF O NEXT GEN
6 ELECTRONIC FILING SYSTEM:

7 E.
8 Martin
9 Estrada
10 United
11 States
12 Attorney
13 Mack E.
14 Jenkins
15 Assistant United States Attorney Chief,
16 Criminal Division Ranee A. Katzenstein
17 Assistant United States Attorney Chief,
18 Criminal Division Valerie Makarewicz
19 Assistant United States Attorney Major
20 Frauds Section 1100 United States
21 Courthouse
22 312
23 North
24 Spring
25 Street
26 Los
27 Angeles,
28 CA
29 90012
30 Telephone: (213) 894-0756 Facsimile:
31 (213) 894-6269 E-mail:
32 Valerie.Makarewicz@usdoj.gov

33 Amanda Liskamm
34 Director, Consumer Protection Branch
35 Manu J. Sebastian
36 Trial Attorneys
37 Consumer Protection Branch
38 U.S. Department of Justice
39 450 Fifth Street NW, Suite 6400 Washington, DC 20001
40 Telephone: (202) 514-0515 Facsimile:
41 (202) 514-8742 E-mail:
42 Manu.J.Sebastian@usdoj.gov
43 Brianna.M.Gardner@usdoj.gov

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45 */S/ Stephen R. Cochell*
46 Stephen R. Cochell
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